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Attorneys for Defendants

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

J. C., by and through her parents, N. AND L. C.,) Case No.C06-02337 JSW
Plaintiff,)
v.) MOTION TO FILE
CALIFORNIA SCHOOL FOR THE DEAF,) ADMINISTRATIVE RECORD
CALIFORNIA DEPARTMENT OF EDUCATION,) UNDER SEAL, [PROPOSED]
and FREMONT UNIFIED SCHOOL DISTRICT,) ORDER
Defendants.) (Local Rule 79-5)
) Courtroom: 2
) Judge: Jeffrey S. White
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Pursuant to Local Rule 79-5, State Defendants, hereby move for an Ex Parte Order permitting State Defendants to lodge, under seal, the administrative record from the special education due process

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1 hearing that is the basis for plaintiff's first cause of action. Attorneys representing the other parties in
2 this matter have stipulated to sealing the administrative record.

3 Dated: November 30, 2006

Respectfully submitted,

4 MARSHA A. BEDWELL
5 General Counsel
6 AMY BISSON HOLLOWAY
7 Assistant General Counsel

8 By: _____
9 REBECCA FREIE
10 Deputy General Counsel
11 Attorneys for Defendants

12 [PROPOSED] ORDER
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15 PURSUANT TO STIPULATION, IT IS ORDERED the document be filed under seal in
16 compliance with Local Rule 79-5.
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19 Dated: November 30, 2006

20 Honorable Jeffrey S. White
21 United States District Court Judge, Northern District
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